

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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PROJECT LION LLC, d/b/a CRUSH d/b/a GREEK SNEEK, PROJECT M LLC d/b/a LA COMIDA, and  
PROJECT W LLC, d/b/a LA CAVE, Individually and  
on Behalf of All Others Similarly Situated,

Plaintiffs,

-against-

BADGER MUTUAL INSURANCE COMPANY,

Defendant.

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**STIPULATION TO EXTEND DEFENDANT'S TIME**  
**TO RESPOND TO AMENDED COMPLAINT**  
**(Second Request)**

**WHEREAS** on April 28, 2020, Plaintiffs PROJECT LION LLC d/b/a CRUSH d/b/a GREEK SNEEK, PROJECT M LLC d/b/a LA COMIDA, and PROJECT W LLC, d/b/a LA CAVE (collectively, "Plaintiffs") filed the Complaint in this action; and

**WHEREAS** on or about May 11, 2020, Plaintiffs submitted a claim to Defendant (the "Claim"); and

**WHEREAS** on May 26, 2020, Defendant BADGER MUTUAL INSURANCE COMPANY ("Defendant") moved pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for dismissal of the Complaint; and

**WHEREAS** on June 16, 2020, Plaintiffs filed the Amended Complaint in this action alleging that they had submitted the Claim; and

**WHEREAS** on June 25, 2020, Defendant withdrew its motion to dismiss the Complaint; and

**WHEREAS** on June 30, 2020, Plaintiffs and Defendant, subject to a full reservation of rights by each, stipulated (the “First Stipulation”) to extend Defendant’s time to answer, move against, and/or otherwise respond to the Amended Complaint until August 14, 2020 so that Defendant can evaluate Plaintiffs’ Claim; and

**WHEREAS** on July 1, 2020, the Court so-ordered the First Stipulation; and

**WHEREAS** Defendant continues to evaluate Plaintiffs’ Claim; and

**WHEREAS** the parties have agreed, with a full reservation of rights by each, to further extend Defendant’s time to answer, move against, and/or otherwise respond to the Amended Complaint so that Defendant can evaluate Plaintiffs’ Claim; and

**WHEREAS** this is the second stipulation for an extension of Defendant’s time to answer, move against, and/or otherwise respond to the Amended Complaint;

**IT IS HEREBY STIPULATED AND AGREED** by and between the undersigned counsel that the time for Defendant to answer, move against, and/or otherwise respond to the Amended Complaint in this action is extended to and hereby is September 14, 2020.

**IT IS FURTHER STIPULATED AND AGREED** that this Stipulation may be signed in counterparts, and faxed or electronic signatures on this Stipulation shall be deemed original signatures.

Dated: August 10, 2020

*Counsel for Plaintiffs Project Lion LLC d/b/a  
Crush d/b/a Greek Sneek, Project M LLC  
d/b/a La Comida, and Project W LLC, d/b/a  
La Cave*

*Counsel for Defendant Badger Mutual  
Insurance Company*

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**SO ORDERED:**



Cam Ferenbach  
United States Magistrate Judge

Dated this 10th day of August, 2020.